

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Kinsale Insurance Company	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 4:23–CV–04680
	§	
Sanare Energy Partners LLC	§	
Defendant.	§	

**JOINT MOTION FOR
CONSENT PROTECTIVE ORDER**

NOW INTO COURT, through undersigned counsel, come all parties to this litigation who jointly move this Court to enter a Consent Protective Order to ease the process of exchanging documents through discovery in this litigation while maintaining the confidentiality of documents that contain trade secrets and other confidential information.

WHEREFORE, Kinsale Insurance Company (“Kinsale”), Sanare Energy Partners, LLC (“Sanare”), and SBS Energy Services, LLC (“SBS”) jointly move this Court to sign the attached Consent Protective Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned Counsel hereby certifies that the foregoing has been served via ECF and/or email on this 22nd day of May, 2025, to the following:

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Certificate of Conference

I certify that, on or before May 22, 2025, counsel for Kinsale conferred with counsel for SBS and Sanare via email concerning the relief to be requested in this motion. All parties agree on the relief sought.

/s/ Collin M. Weyand
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